

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CYRANO, INC.,

Plaintiff,

v.

QUOTIUM TECHNOLOGIES, INC.,
QUOTIUM TECHNOLOGIES, S.A., and
TECHNOLOGIES, S.A.,

Defendants.

CIVIL ACTION NO. 05-CV-11558-DPW

**ASSENTED-TO MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM IN
SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Local Rule 7.1(b)(3), the Plaintiff, Cyrano, Inc., now known as Vedant Incorporated ("Cyrano"), moves for leave to file a memorandum in response to the Defendants' opposition to Cyrano's pending motion for preliminary injunction. As grounds for granting this request, Cyrano states the following:

The Defendants filed a forty-three (43) page brief, not including nine attached exhibits, in opposition to Cyrano's motion -- as well as two volumes of additional exhibits. Contrastingly, Cyrano filed a twenty-five (25) page brief, to which five exhibits were attached. Fairness demands that Cyrano have the opportunity to respond to matters presented in the Defendants' filing that are now part of the record in this matter. A relatively short reply memorandum will also assist the Court in identifying the main areas of disagreement between the parties that risk being obfuscated in the now massive record.

A reply brief will further inform the Court as to the irreparable harm Cyrano will suffer if injunctive relief is not granted. Also, to the extent that the Defendants' opposition denies that there have been recent developments that would necessitate the relief Cyrano seeks, Cyrano requests the opportunity to respond. Finally, a reply brief is necessary to clarify the facts as they are presented in the Defendant's opposition.

The Defendants have assented to the relief requested, although not all of the reasoning offered in support thereof.

Respectfully submitted,

CYRANO, INC.,
By its attorneys,

/s/ Michael K. Sugrue
Stephen Y. Chow, BBO #082990
Michael K. Sugrue, BBO #655878
BURNS & LEVINSON LLP
125 Summer Street
Boston, Massachusetts 02110
(617) 345-3000

Dated: July 17, 2006

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I hereby certify that I conferred with Kevin J. O'Connor, Esq., counsel of record for the Defendants, and he assented to the relief being requested, but not all of the reasoning offered in support thereof.

/s/ Michael K. Sugrue
Michael K. Sugrue

CERTIFICATE OF SERVICE

I, Michael K. Sugrue, hereby certify that a true copy of the foregoing Motion for Leave to File A Reply Memorandum in Support of Plaintiff's Motion Preliminary Injunction was served upon Kevin J. O'Connor, Mayeti Gametchu, and John Pagliaro, counsel for the Defendants, by regular mail on this the 17th day of July, 2006:

/s/ Michael K. Sugrue

Michael K. Sugrue

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